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Attorney for Defendant
JUAN DAGIO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

UNITED STATES OF AMERICA,

Plaintiff,

v.

JUAN DAGIO,

Defendant.

Case No. CR 20-00431 VC [TSH]

**JUAN DAGIO’S EX PARTE
APPLICATION FOR ORDER
PERMITTING MODIFICATION TO
TRAVEL RESTRICTIONS; [PROPOSED]
ORDER**

I, Ashley Riser, declare:

1. I represent Defendant Juan Dagio in the above-entitled matter. He is currently on pretrial release with an unsecured \$10,000 bond. His release conditions also require him to reside at the halfway house located 111 Taylor Street (“the halfway house”). Dkt. 109. The purpose of this application is to respectfully request that Mr. Dagio’s pretrial conditions are modified as follows to permit him to:
 - a. Leave the halfway house from 4:30 PM to 10:30 PM on April 15, 2022 to attend a church event; and
 - b. Leave the halfway house every Sunday from 9:00 AM to 12:45 PM to attend regular church services.
2. Defense counsel contacted Pretrial Services regarding this request, and Mr.

1 Dagio's Pretrial Services Officer, Officer Josh Libby, does not object. Further,
2 defense counsel provided Officer Libby with all pertinent contact information,
3 travel details, and event information.

4 3. Assistant United States Attorney Barbara Valliere does not object to this request.

5 4. Based on the foregoing, I respectfully request that the conditions of Mr. Dagio's
6 release be modified to allow him to leave the halfway house on April 15, 2022 to
7 attend a church event. Further, I respectfully request that the conditions of Mr.
8 Dagio's release be modified to allow him to leave the halfway house every Sunday
9 morning to attend regular church services.

10 5. All other conditions of release shall remain the same.

11
12 I declare under penalty of perjury under the laws of the United States that the foregoing is
13 true and correct.
14
15

16 DATED: April 11, 2022

17 By: /s/
Barbara Valliere
Assistant United States Attorney

18
19 DATED: April 11, 2022

20 By: /s/
Ashley Riser
Counsel for JUAN DAGIO

[PROPOSED] ORDER

Based on the foregoing, and good cause appearing:

IT IS HEREBY ORDERED that the conditions of Defendant Juan Dagio's release shall be modified as follows:

Mr. Dagio is permitted to leave the halfway house located at 111 Taylor Street on April 15, 2022 to attend a church event. Mr. Dagio is also permitted to leave the halfway house every Sunday morning to attend regular church services.

All other terms and conditions shall remain in place.

DATED: _____

THOMAS S. HIXSON
United States Magistrate Judge